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*Christensen Development, LP and
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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

MARIETTA VALLEN, an individual,

Plaintiff,

v.

CASE NO.: 2:24-cv-2155- EJY

ALBERTSON'S LLC., a Foreign Limited-
Liability Company; CHRISTENSEN
DEVELOPMENT, LP, a Foreign Limited
Partnership; TRAILS VILLAGE CENTER
COMPANY, an unregistered Domestic
Corporation dba TRAILS VILLAGE
CENTER; DOES 1-20 and ROE BUSINESS
ENTITIES 1-20, inclusive,

**STIPULATION TO EXTEND BRIEFING
SCHEDULE REGARDING DEFENDANT
ALBERTSON'S LLC'S MOTION FOR
SUMMARY JUDGMENT**

Defendants.

Pursuant to Rule IA 6-L of the Local Rules of Practice for the United States District
Court, District of Nevada, Plaintiff Marietta Vallen ("**Plaintiff**") and Defendants Albertson's
LLC ("**Albertsons**"), Christensen Development, LP ("**Christensen**") and Trails Village Center
Company dba Trails Village Center ("**TVC**"), by and through their attorneys of record and
hereby stipulate and agree to extend the briefing schedule with respect to Defendant
Albertson's LLC's Motion for Summary Judgment [ECF No. 38] ("**MSJ**") as follows:

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1 1. Albertsons filed its MSJ on December 9, 2025.

2 2. The current deadline for dispositive motions is December 11, 2025.

3 3. Counsel for Defendants Christensen and TVC underwent a medical procedure last
4 week that resulted in complications and a longer recovery period than originally anticipated.
5 Counsel intends to file a substantive joinder to Albertsons' MSJ.
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7 4. Given the circumstances, defense counsel reached out to all parties to ask for a brief
8 extension to file their substantive joinder.

9 5. The parties have agreed to allow Defendants Christensen and TVC until Monday,
10 December 15, 2025, to file their substantive joinder.
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6. This is the parties' first request for an extension of the briefing schedule with respect to MSJ. The parties affirm that this extension is not made with an improper purpose but is made in good faith in light of the present circumstances.

DATED this 11th day of December, 2025.

DATED this 11th day of December, 2025

MORGAN & MORGAN

OLSON CANNON & GORMLEY

/s/ Gregory Kraemer, Esq.
GREGORY KRAEMER, ESQ.
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Attorney for Plaintiff

/s/ Stephanie Zinna, Esq.
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*Christensen Development, LP and
Trails Village Center*

DATED this 11th day of December, 2025.

BRANDON | SMERBER LAW FIRM

/s/ Ryan M. Venci, Esq.
LEE BRANDON, JR., ESQ.
Nevada Bar No. 005880
RYAN M. VENCI, ESQ.
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Attorney for Defendant
ALBERTSON'S LLC

ORDER

IT IS SO ORDERED.


UNITED STATES MAGISTRATE JUDGE

Dated: December 11, 2025